

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**RE: Dorothea Elizabeth Kucharski,
Debtor**

BK NO. 24-13634-amc

**Onslow Bay Financial LLC
Movant**

Chapter 13

Hearing Date: 01/15/2025

vs.

**Dorothea Elizabeth
Kucharski,**

Respondents

**Scott F. Waterman,
Trustee**

**OBJECTION OF ONSLOW BAY FINANCIAL LLC TO CONFIRMATION OF
CHAPTER 13 PLAN**

Onslow Bay Financial LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 Plan and asserts in support of its Objection as follows:

1. Debtor's Plan does not treat Creditor's prepetition arrearage claim of \$7,945.60 as set forth in its Proof of Claim filed in this case on November 18, 2024, as claim (4).
2. Accordingly, Confirmation of the Plan should be denied until Debtor amends the Plan to properly treat Creditor's claim.
3. Creditor reserves the right to raise any failure of Debtor to timely make all payments under the Plan or required by the Plan, if at the time of the confirmation hearing that appears to be the case.
4. WHEREFORE, the Secured Creditor, Onslow Bay Financial LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: December 10, 2024

/s/Brian Nicholas

Brian Nicholas

Attorney for Creditor

McCalla Raymer Leibert Pierce, LLC

325 Chestnut Street, Suite 725

Philadelphia, Pennsylvania, 19106

8489994640

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RE: Dorothea Elizabeth Kucharski

Debtor

CHAPTER 13

BK. NO. 24-13634-AMC

Onslow Bay Financial LLC

Movant

vs.

**Dorothea Elizabeth
Kucharski
Scott F. Waterman,
Trustee**

CERTIFICATION OF SERVICE

I, the undersigned, hereby certify that the foregoing Objection to Confirmation was served by first class mail, postage pre-paid, upon the parties listed below on **December 10, 2024**.

Chapter 13 Trustee

Scott F. Waterman [Chapter 13]
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
VIAECF

Attorney for Debtor

Joseph L Quinn
Ross, Quinn & Ploppert, P.C.
192 S. Hanover Street
Suite 101
Pottstown, PA 19464
VIAECF

Debtor

Dorothea Elizabeth Kucharski
601 Monroe Avenue
Glenside, PA 19038
VIA U.S. MAIL

Dated: December 10, 2024

By: /s/Brian Nicholas

Brian Nicholas
Attorney for Movant